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12	IN THE UNITED OF	TEC DICTRICT COLIDT
13	IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA SAN JOSE DIVISION	
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15	WANDER WOLL I I I I I I I I I I I I I I I I I I	- G N 00 00007 PN W
16	WAYNE KOH, on behalf of himself and all others similarly situated	Case No.: 09-cv-00927 RMW
17	Plaintiff,	STIPULATION AND [PROPOSED] ORDER CONTINUING HEARING ON PLAINTIFF'S MOTION TO COMPEL
18	VS.	
19	S.C. JOHNSON & SON, INC.,	
20	Defendant.	
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22	CTIDIU ATION AND IDDODOCEDI ODDED	
23	STIPULATION AND [PROPOSED] ORDER CONTINUING HEARING ON PLAINTIFF'S MOTION TO COMPEL	
24	Pursuant to Civil L.R. 6-2, plaintiff Wayne Koh and defendant SC Johnson & Son, Inc.	
25	(collectively, the "Parties"), by their attorneys, hereby stipulate, contingent upon permission of the	
26	Court, to continue the hearing on plaintiff's motion to compel production of certain documents over	
27	which SC Johnson asserts privilege (Docket No. 93), from June 21, 2011 at 10:00 a.m. to July 12,	
28		
-	Stipulation and [Proposed] Order Continuing Hearing on Plaintiff's Motion to Compel	Case No. 09-cv-00927 RMW

2011 at 10:00 a.m. At this time, the parties believe it is in the interests of efficiency and judicial 1 economy to work further toward settlement, which would obviate the need for such hearing. 2 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD. 3 DATED: June 17, 2011 4 REESE RICHMAN LLP 5 6 /s/ Michael R. Reese Michael R. Reese 7 875 Avenue of the Americas, 18th Floor New York, New York 10001 8 Telephone: (212) 643-0500 Facsimile: (212) 253-4272 9 10 KIRKLAND & ELLIS LLP 11 12 /s/ Bradley H. Weidenhammer Nickolas A. Kacprowski, Bar No. 242684 13 555 California Street San Francisco, CA 94104 Telephone: (415) 439-1400 14 Facsimile: (415) 439-1500 15 Jeffrey L. Willian, P.C. (*Pro Hac Vice*) Robert B. Ellis, P.C. (*Pro Hac Vice*) 16 Bradley H. Weidenhammer (Pro Hac Vice) 300 North LaSalle Street 17 Chicago, IL 60654 Telephone: (312) 862-2000 18 Facsimile: (312) 862-2200 19 20 (PROPOSED) ORDER 21 PURSUANT TO STIPULATION, IT IS SO ORDERED. 22 **DATED:** June 20, 2011 23 24 25 26 HOWARD R. LLOYD United States Magistrate Judge 27 28

CERTIFICATE OF SERVICE 1 I hereby certify that I caused a true and correct copy of the foregoing STIPULATION AND [PROPOSED] ORDER CONTINUING HEARING ON PLAINTIFF'S MOTION TO COMPEL on 2 this day, June 17, 2011, to be served upon the following counsel by way of the CM/ECF electronic 3 filing system. 4 REESE RICHMAN LLP 5 Michael R. Reese Kim E. Richman 6 875 Avenue of the Americas, 18th Floor New York, NY 10001 7 Telephone: (212) 579-4625 8 Facsimile: (212) 253-4272 Email: mreese@reeserichman.com 9 WHATLEY DRAKE & KALLAS LLC 10 Deborah Clark-Weintraub 1540 Broadway, 37th Floor 11 New York, NY 10036 Telephone: (212) 447-7070 12 Facsimile: (212) 447-7077 13 Email: dweintraub@wdklaw.com 14 Attorneys for Plaintiff 15 Dated: June 17, 2011 /s/ Bradley H. Weidenhammer KIRKLAND & ELLIS LLP 16 Nickolas A. Kacprowski, Bar No. 242684 17 555 California Street San Francisco, CA 91404 18 Telephone: (415) 439-1400 Facsimile: (415) 439-1500 19 Jeffrey L. Willian, P.C. 20 Robert B. Ellis, P.C. Bradley H. Weidenhammer 21 Amy E. Crawford 22 300 North LaSalle Street Chicago, IL 60654 23 Telephone: (312) 862-2000 Facsimile: (312) 862-2200 24 Counsel for SC Johnson & Son, Inc. 25 26 27 28